

ALEXANDER W. KNOWLES Senior Staff Attorney

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January 21, 2022

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE: Public Service Commission Review of South Carolina Code of Regulations Chapter 103 Pursuant to S.C. Code Ann. Section 1-23-120(J)

Docket No. 2020-247-A - Transportation Regulations Review

Dear Ms. Boyd:

At the Commission's Workshop to Further Review Motor Carrier Insurance Requirements held January 19, 2022, ORS's recommendation relating to Commission Regulation 103-133(6)(E) was discussed. In light of that discussion, ORS would respectfully submit the following modified recommendation to amend the language of that regulation as follows:

- E. Minimum Periodic Inspection Standards.
- 1. All carriers must comply with all applicable state and federal inspection requirements.
- 2. A vehicle does not pass inspection if deficient under any standard included in 1 above. Further, a vehicle does not pass an inspection if any defects or deficiencies are detected with reference to the wheelchair lift or any component relating to the loading of passenger or patient into the vehicle.
- 3. Any ORS representative or any officers, drivers, agents, representatives, and employees directly concerned with the inspection or maintenance of motor vehicles may recommend that a vehicle be put "out of service" for defects or deficiencies detected with reference to applicable state and federal requirements and defects or deficiencies detected with reference to the wheelchair lift or any component relating to the loading of a passenger into the vehicle.

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Thank you for your consideration of these comments.

Sincerely,

/s/ Alexander W. Knowles

Alexander W. Knowles

cc: All Parties of Record (via e-mail)C. Jo Anne Wessinger Hill, Esquire (via e-mail)David Butler, Esquire (via e-mail)